

Ms. Pamela Tames  
U.S. Environmental Protection Agency  
290 Broadway, 20th Floor  
New York, New York 10007-1866

Subject:

Pre-Design Investigation Work Plan and Local Disposal Assessment  
Lower Ley Creek Subsite of the Onondaga Lake Superfund Site  
Syracuse, New York

Arcadis of New York, Inc.  
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ENVIRONMENT

Dear Ms. Tames:

On behalf of the Respondents to the Administrative Order on Consent for Remedial Design (Respondents), Arcadis of New York, Inc. (Arcadis) thanks you for your February 2, 2017 comments regarding the December 16, 2016 Lower Ley Creek Subsite Pre-Design Investigation (PDI) Work Plan.

Arcadis and the Respondents have begun preparatory work for the PDI field investigation activities anticipated to commence mid-April 2017, weather-dependent, and will soon submit to EPA a detailed proposed schedule of investigation activities.

The Respondents understand EPA's view regarding additional PDI sampling and post-excavation sampling. To advance the design process, the Respondents are agreeable to initiating the PDI as set forth in the revised PDI Work Plan. The Respondents continue to submit, however, that the purpose of the PDI and associated remedial design activities is refinement of the removal limits set forth in the Record of Decision (ROD) to meet the Remedial Action Objectives (RAOs) for this site. To this end, a discussion is still necessary with EPA prior to completion of the PDI to review and discuss the initial PDI data (and potential additional data needs), the implementation of the remedy and satisfaction of the RAOs for the site, and the specifics of any expected post Remedial Action (RA) confirmation sampling. It is in everyone's best interest, and consistent with EPA's latest contaminated sediment remediation guidance (Stanislaus, Jan. 2017), that the PDI support the development of a well-defined remedy which is targeted to achieve well-defined RAOs with as little remedial uncertainty as possible.

The Respondents also request an update on EPA's review of the Local Disposal Assessment Report. EPA's initial approval of the two local disposal options is important but we note each disposal option may need to be further evaluated in light of the PDI results and the impact, if any, of those results on estimated sediment and/or soil removal volumes.

Date:

March 27, 2017

Contact:

Mark Gravelding

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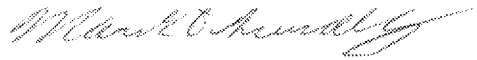
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Ms. Pamela Tames  
March 27, 2017

Sincerely,

Arcadis of New York, Inc.



Mark O. Gravelding  
Project Coordinator

Copies:

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All Respondents